

ERIC A. LIEPINS
ERIC A. LIEPINS, P.C.
12770 Coit Road
Suite 1100
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - telecopier

PROPOSED ATTORNEY FOR DEBTOR

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

IN RE: §
§
NOBLE REY BREWING CO., LLC § CASE NO 18-34214
§
§

RESPONSE TO MOTION FOR RELIEF FROM AUTOMATIC STAY

TO THE HONORABLE UNITED STATES BANKRUPTCY JUDGE:

COMES NOW, Noble Rey Brewing Co., LLC. ("Debtor") in the above-styled and numbered cause, and files this its Response to Motion for Relief from Automatic Stay ("Motion"), and in support thereof would respectfully show unto the Court as follows:

1. Debtor admits the allegations contained in paragraph 1 of the Motion.
2. Debtor admits that an affidavit identified in paragraph 2 of the Motion is attached. Debtor does not admit the validity of the statements contained in the affidavit.
3. Debtor has insufficient knowledge to admit or deny the allegations contained in paragraph 3 of the Motion.
4. Debtor admits that there was a lease agreement for the premises and the lease

controls the terms of the agreement discussed in paragraph 4 of the Motion.

5. Debtor admits it made payments to Movant in January and February of 2019 but did not make payment in March 2019 as asserted in paragraph 5 of the Motion.
6. Debtor denies eh allegations contained in paragraph 6 of the Motion.
7. Debtor denies the allegation contained in paragraph 7 of the Motion.
8. Debtor admits the allegations contained in paragraph 8 of the Motion.
9. Debtor admits the allegations contained in paragraph 9 of the Motion.
10. Debtor admits the allegations contained in paragraph 10 of the Motion.
11. Debtor admits the allegations contained in paragraph 11 of the Motion.
12. Debtor admits the allegations contained in paragraph 12 of the Motion.
13. Debtor admits the allegations contained in paragraph 13 of the Motion.
14. Debtor makes no response to paragraph 14 of the Motion as it does not assert any claims against the Debtor.
15. Debtor denies the allegations contained in paragraph 15 of the Motion.
16. Debtor denies the allegations contained in paragraph 16 of the Motion.
17. Debtor denies the allegations contained in paragraph 17 of the Motion.

WHEREFORE, PREMISES CONSIDERED, Debtor, Noble Rey Brewing Co., LLC.

respectfully pray this Honorable Court enter an denying the Motion and for such other and further relief, at law or in equity, to which Debtor may show itself justly entitled.

Respectfully submitted,

ERIC A. LIEPINS, P.C.

12770 Coit Road, Suite 1100
Dallas, Texas 75251
(972) 991-5591
(972) 991-5788 - fax

BY: /s/ Eric Liepins
ERIC A. LIEPINS, SBN 12338110

CERTIFICATE OF SERVICE

I hereby certify that a true and correct copy of the foregoing document was sent to Thomas Berghman, 3800 Ross Tower, 500 N Akard Street, Dallas, Texas 75201 via United States mail on this the 11th day of April 2019.

/s/ Eric Liepins
Eric A. Liepins